TCVP Response Statement

For April 23, 2020

Tetrachlorvinphos (TCVP) is an organophosphate insecticide registered to control various insects including public health pests such as fleas, ticks, flies, lice, and pest larvae. TCVP is used as a dermal or oral treatment to livestock (i.e., cattle, swine, poultry and horses) and their premises, in kennels, outdoors as a perimeter treatment, and as a flea treatment on cats and dogs. All TCVP crop uses were voluntarily cancelled in 1987.

On April 23, 2009, the National Resources Defense Council (NRDC) submitted a petition to cancel all EPA pet uses for the pesticide TCVP. The NRDC requested these cancellations based on their belief the Agency did not include the TCVP pet collar use pattern and that the Agency used assumptions which underestimated exposures when conducting the risk assessment in support of the 2002 TCVP RED.

During the registration review of TCVP, the agency issued a revised human health risk assessment and requested additional data on the composition of pet collars from the registrant, Hartz Mountain Corporation. The data was submitted by the registrant in late August 2019 and was reviewed and accepted by the agency.

Commented [GJ1]: Should also state that the data was submitted and accepted

Commented [FD2R1]: Yes, I think we should make a point that it was recently submitted and recently accepted, and we should specify we had anticipated doing so by June 2020 (and link to the reg. review schedule)

Commented [BP3R1]: Added, will link to reg review website

The agency intends to incorporate these data into a new human health risk assessment that will be used to determine what pet products pose risks of concern to residential applicators. Protecting children's health a top priority for EPA. EPA bases its regulatory determinations on scientific risk assessments and risk mitigation, consistent with US federal law. Registration review is a comprehensive, scientific and transparent process.

Background:

In 2009 the Natural Resources Defense Council (NRDC) filed the petition for the EPA to cancel all pet uses of TCVP. The EPA initially determined that the petition must be denied in November 2014 based on the available data at the time. In January 2015, the NRDC filed a petition for review of EPA's denial. In response, the agency revised the human health risk in December 2016 assessment with the use of additional data finding health risks for young children that exceeded acceptable levels. The estimated risks are based on assumptions of the composition of the pet collars, specifically how much of the active ingredient is present in the form of dust or liquid. The EPA issued a letter in response to NRDC's cancellation petition in March 2017 stating that the agency intends to address any risk mitigation issues in the course of registration review.

Commented [BP4]: NRDC provided the Davis study?

Commented [GJ5]: What data? 2012 residential SOPs? So far we've only discussed the study submitted by Hartz which was later than this

Commented [FD6R5]: Let's be as clear as we can be on this, as I anticipate there may be confusion on the various data once the draft desk statement gets out of OPP

Commented [BP7R5]: I believe it was the Davis study (how should we describe it, human exposure data?)

From 2017 to 2018, EPA entered into negotiations with the registrant, Hartz Mountain Corporation, for the development of new pet collar data to address the composition and ratio of material coming off pet collars (% liquid vs. dust). As a result, the EPA issued a data call-in (DCI) requiring Hartz to submit a composition study to address the composition of pet collars in June 2019.

NRDC filed a petition contending that the EPA has unreasonably delayed responding to the 2009 petition in late June 2019. TCVP is undergoing registration review, a program that re-evaluates all pesticides on a 15-year cycle. This is a comprehensive, scientific and transparent process that will further evaluate TCVP's potential effects. EPA is working to update its human health risk assessment with the data

submitted by the registrant in August 2019, which will result in a more complete, accurate assessment of the risks of TCVP. EPA has thus far met all stated deadlines to date in the registration review process.